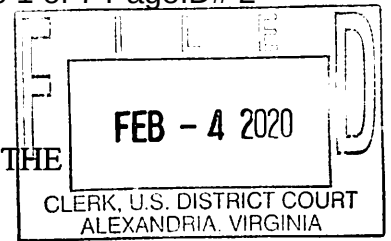


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA



Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 1:20-MJ-49
)	
RYAN GUY PARKER,)	<u>UNDER SEAL</u>
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Bret M. Stolle, being duly sworn, hereby, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the U.S. Department of Transportation, Office of the Inspector General, and have been since April 2016. During my employment as a Special Agent, I have been assigned to investigate violations of federal law including, but not limited to, flying aircraft without certification, suspected unapproved aircraft parts, and other transportation safety crimes. In these investigations, I have been involved in the execution of arrest, search, and seizure warrants. I have received training in interviews, the executions of searches and arrests, communications platforms, computer networks, and various other criminal investigative procedures.

2. The facts set forth in this affidavit are based upon my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other law enforcement personnel, review of documents related to this investigation, communications with

others who have personal knowledge of the events and circumstances described herein, and information gained through training and experience. I have not included in this affidavit every fact known to me in regard to this investigation, but rather only those facts which are sufficient to establish probable cause.

3. I make this affidavit in support of a criminal complaint charging that on or about September 27, 2018, in Fredericksburg, Virginia, within the Eastern District of Virginia, **RYAN GUY PARKER (“PARKER”)** knowingly and willfully served, or attempted to serve, as an airman, without an airman’s certificate authorizing him to do so, in violation of Title 49, United States Code, Section 46306(b)(7).

BACKGROUND

4. The Federal Aviation Administration (FAA) regulates and licenses pilots in the United States. In order to obtain a private pilot’s license (hereafter, a certificate or airman’s certificate), a candidate must first obtain a student pilot’s certificate and a medical certificate stating the candidate is medically capable of operating and flying an airplane. The candidate must then pass the FAA’s written private pilot exam, complete flight instruction with a certified instructor, and finally, pass the FAA’s practical exam. Typically, in order to earn a private pilot’s certificate, candidates undergo dozens of hours of in-flight training, spanning weeks or months—including training and practice in takeoffs and landings, turns and other maneuvers, cross-country navigation, emergency procedures, and use of instrumentation.

5. Untrained individuals operating airplanes in any manner pose a significant risk of injury and death to themselves and the public. For this reason, serving or attempting to serve as an airman without an airman’s certificate is a felony. An “airman” is defined, in 49 U.S.C. 40102, in

part, as any individual in command of an aircraft, or as pilot, mechanic, or member of the crew, who navigates an aircraft when under way. According to the FAA airman's database, **PARKER** does not have an airman's certificate, and accordingly, he is not legally allowed to serve or attempt to serve as an airman, including flying aircraft or navigating aircraft when under way.

6. On September 2, 2018, **PARKER** was recorded on security cameras at the Stafford Regional Airport, in Fredericksburg, Virginia, within the Eastern District of Virginia. Witness 1 (W-1), the Stafford Regional Airport manager, identified **PARKER** on multiple security videos recorded that night. At about 10:37pm, an aircraft, bearing tail number N2341P, hangered at the Stafford Regional Airport was recorded taxiing down the terminal apron and taxiway. N2341P then taxied onto the runway and gained speed—as if to take off—before disappearing off-camera. At about 10:52pm, N2341P taxied back down the runway in the opposite direction, and back onto the terminal apron. Four other security videos captured during the same timeframe that night show **PARKER**, an unknown female, and a car identified by W-1 as **PARKER's** at Stafford Regional Airport. N2341P is a Piper Tomahawk owned by S.B.

7. On September 6, 2018, **PARKER** returned to the Stafford Regional Airport and was again captured on security cameras. W-1 identified **PARKER** in one video recorded that night and identified **PARKER's** car in another. At about 8:36pm, **PARKER** walked onto the terminal apron and approached an aircraft bearing tail number N906PS. **PARKER** removed the cockpit cover, turned on the aircraft's marker and strobe lights, removed the engine manifold covers, and untied the aircraft's wings and tail from their tie-downs. These actions are consistent with preflight checks. **PARKER** attempted to start the engine a few times, but did not succeed.

According to W-1, as a safety measure, pilots will not untie the wings and tail of an aircraft unless they intend to taxi or fly it. N906PS is a Piper Cherokee also owned by S.B.

8. On September 27, 2018, **PARKER** went to Shannon Airport, in Fredericksburg, Virginia, within the Eastern District of Virginia, and flew another aircraft, bearing tail number N4463F, pictured below in Image #1, owned by S.B. This flight was witnessed and recorded by Witness 2 (W-2). W-2 is familiar with **PARKER** because **PARKER** used to operate an aircraft washing business at Shannon Airport called 'Outlaw Aviation,' and because **PARKER** had approached him about getting a job at Shannon Airport. W-2 saw **PARKER** flying N4463F, which he described as "a bucket of bolts" and unsafe, at about 2:57pm. During this flight, **PARKER** flew the aircraft over two large tanks containing 18,000 gallons of fuel, at an altitude of only approximately 50 feet. According to W-2, an aircraft accident involving the fuel tanks would be like a bomb going off at the airport. N4463F does not have a certificate of airworthiness from the FAA. S.B. told Your Affiant that **PARKER** put a caster wheel on N4463F, which is not an appropriate wheel for an airplane and can be seen in the image below, in order to taxi the airplane.

IMAGE # 1



9. **PARKER's** flight on this day was also witnessed by Witness 3 (W-3), Witness 4 (W-4), and Witness 5 (W-5). W-4 and W-5 saw **PARKER** fly N4463F for 10-15 minutes in patterns, during which time W-5 took two videos. **PARKER** bounced the airplane on landing and spun out. W-2 spoke with **PARKER** after the flight, and **PARKER** told him he had been working on the aircraft when the throttle became stuck, causing him to go airborne. Multiple witnesses stated the weather and poor visibility that day made conditions too unsafe to fly N4463F, given its lack of instrumentation.

10. On or around September 30, 2018, **PARKER** told W-2 that he had recently flown someone's plane, under the impression that he had permission, and, as a result, that he might be in some trouble. **PARKER** confessed to Witness 6 (W-6) that he had flown his Tomahawk and a Beechcraft Bonanza, a large high-performance aircraft that requires a special rating in addition to a pilot's license to legally fly. **PARKER** also told W-6 that, while working at the Manassas Airport, he flew one of the Liberty flight school's aircraft. When W-6 asked how **PARKER** covered up his usage of fuel, **PARKER** explained that he simply returned the plane to the line when he was done, and the linemen would refuel the plane in the morning on Liberty's account.

CONCLUSION

11. Based on the information contained herein, I respectfully submit that there is probable cause to believe that on September 27, 2018, in Fredericksburg, Virginia, within the Eastern District of Virginia, **RYAN GUY PARKER** did knowingly serve or attempt to serve as an airman, without an airman's certificate authorizing him to serve in that capacity, in violation of Title 49, United States Code, Section 46306(b)(7).



Bret M. Stolle
Special Agent
U.S. Department of Transportation,
Office of Inspector General

Sworn and subscribed before me
on this 4th day of February, 2020



/s/

Ivan D. Davis
United States Magistrate Judge